## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

SOUTHWESTERN BELL TELEPHONE § § COMPANY, et al., § § Plaintiffs, § CIVIL ACTION NO. 09-CV-1268 IDT TELECOM, INC., ENTRIX § § TELECOM, INC., and JOHN DOES 1-10, § Defendants. Ş

## **JOINT MOTION FOR EXTENSION OF EXPERT DEADLINES**

TO THE HONORABLE JORGE A. SOLIS, U.S. DISTRICT JUDGE:

Plaintiffs and Defendants jointly request the Court extend the expert witness designation and disclosure deadlines set forth in the Scheduling Order in this case, and in support thereof would respectfully show the Court the following:

- 1. The Scheduling Order requires parties with the burden of proof on a claim to file a designation of expert witnesses and comply with Rule 26(a)(2) no later than July 5, 2011, and sets August 4, 2011, as the deadline for rebuttal designation of expert witnesses and compliance with Rule 26(a)(2).
- 2. The parties are fully engaged in document discovery in the case and need additional time for their experts to review and evaluate the voluminous documents that have been produced and that continue to be produced before the experts can render their opinions.
- 3. Accordingly, good cause exists to extend the expert designation and disclosure deadlines, and thus the parties have agreed to extend the expert designation and disclosure deadlines by thirty (30) days. The parties are not seeking an extension of any of the other deadlines established by the Scheduling Order. The parties hereby request the Court amend

paragraphs 6 and 7 of the Scheduling Order as follows:

- 6) The party with the burden of proof on a claim shall file a designation of expert witnesses and comply with Rule 26(a)(2) no later than August 4, 2011;
- 7) Rebuttal designation of expert witnesses and compliance with Rule 26(a)(2) shall be made no later than September 9, 2011.

### Respectfully submitted,

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# **CERTIFICATE OF SERVICE**

On the 27<sup>th</sup> day of May, 2010, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court for the Northern District of Texas using the electronic filing system of the Court. I hereby certify that I served a true and correct copy of the foregoing document on all counsel of record electronically or in another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Tam	my S.	Wood	
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